

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

THE TRUSTEES OF THE NEW YORK)	
STATE NURSES ASSOCIATION)	
PENSION PLAN,)	
)	
Petitioners,)	Case No. 21-cv-8330 (LAK)
)	
v.)	
)	
WHITE OAK GLOBAL ADVISORS, LLC,)	
)	
Respondent.)	

**DECLARATION OF THOMAS K. CAULEY, JR. IN SUPPORT OF RESPONDENT’S
MOTION TO STAY EXECUTION OF THE JUDGMENT, OR
ALTERNATIVELY, TO QUASH OR MODIFY SUBPOENAS**

I, Thomas K. Cauley, Jr., declare as follows:

1. I am a partner in the law firm of Sidley Austin LLP (“Sidley”). Sidley represents Respondent, White Oak Global Advisors, LLC (“White Oak”), in the above-captioned case.

2. I submit this Declaration in support of White Oak’s motion to stay execution of the Court’s March 17, 2022 judgment, or alternatively, to quash the subpoena Petitioners issued to SEI Investments Company and to modify the subpoena Petitioners issued to First Republic Bank.

3. Attached hereto as Exhibit A is a true and correct copy of Petitioners’ May 9, 2022 letter to White Oak.

4. Attached hereto as Exhibit B is a true and correct copy White Oak’s May 11, 2022 response letter to Petitioners’ May 9, 2022 letter.

5. Attached hereto as Exhibit C is the May 18, 2022 email from Petitioners’ counsel to White Oak’s counsel attaching subpoenas to SEI Investment Company and First Republic

Bank. Petitioners' May 18 email states that those two subpoenas are "being served today [May 18]."

6. Attached hereto as Exhibit D is Petitioners' subpoena to SEI Investment Company that was provided to White Oak's counsel as an attachment to Petitioners' May 18, 2022 email.

7. Attached hereto as Exhibit E is Petitioners' subpoena to First Republic Bank that was provided to White Oak's counsel as an attachment to Petitioners' May 18, 2022 email.

Executed in Chicago, Illinois, on May 24, 2022.

/s/ Thomas K. Cauley, Jr.
Thomas K. Cauley, Jr.